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Meeting Minutes Transmittal

Simulated High Level Waste Slurry Closure Plan
Unit Managers Meeting
324 Building, Upstairs Conference Room
300 Area
Richland, Washington

August 10, 1993
8:00 a.m. to 10:00 a.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers Meeting.

Randall N. Krekel Date: 1-4-94
Randall N. Krekel, Unit Manager, RL

Not Present Date: _____
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Greta P. Davis Date: 1-28-94
Greta P. Davis, Unit Manager, Washington State Department of Ecology

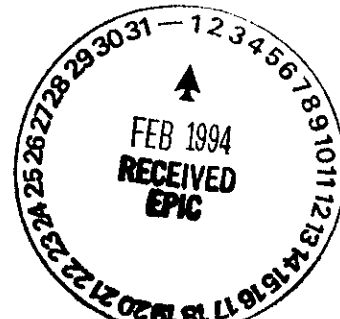
Simulate High-Level Waste Slurry, PNL Concurrence

Wayne Slater Date: Nov 18, 1993
HW Slater, Contractor Representative

Purpose: Discuss Revision of Closure Plan

Meeting Minutes are attached. The minutes are comprised of the following:

- Attachment #1 - Agenda
- Attachment #2 - Summary of Discussion
- Attachment #3 - Attendance List
- Attachment #4 - Action Items
- Attachment #5 - Discussion of 6/29/93 Ecology Informal Comments on Closure Plan



Attachment 1

Simulated High Level Waste Slurry Closure Plan
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Agenda

1. Status of closure plan revisions
 - Timetable for next revision (RL/PNL)
 - Sections of closure plan that will be change and the rational for the change (RL/PNL)
 - Specific technical questions on closure plan requirements (RL/PNL/Ecology)
2. Timetable for review of next revision
 - Ecology review time (Ecology)
 - Anticipated date of NOD (Ecology)
 - RL/PNL response (RL/PNL)
3. General Discussion
 - DQO Process
 - R.O. Lokken Document
4. Action Items
 - New action items
5. Set next meeting date
 - Tentative dates
 - Proposed topics

Attachment 2

**Simulated High Level Waste Slurry Closure Plan
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**August 10, 1993
8:00 a.m. to 10:00 a.m.**

Summary of Discussion and Commitments/Agreements

Status of Closure Plan Revisions

BE Opitz (PNL) and CW Lindenmeier (PNL) distributed a handout summarizing Ecology informal comments on Revision 5 of the closure plan and the action and response made to address the comments (Attachment 5). The informal comments were given by GP Davis at an informal meeting on June 29, 1993. Mr. Opitz and Mr. Lindenmeier went through each of the comments and explained the response. During the explanation following points were discussed:

GP Davis (Ecology) wanted to know how background contamination levels would be established and if the Hanford Site background study would be used. The closure plan is far enough along that the study may be used. RN Krekel (RL) stated that he did not know the status of the study and didn't know if it could or would be used. He said he would check with FA Ruck of WHC on the status of the study and inquire if it could be used in establishing background levels in the 3000 area.

Action Item:

RL (RN Krekel) will check on the Hanford background study and see if it could be used in establishing background levels for the SHLWS T/S closure plan.

Ms. Davis stated she will review the SHLWS logbook soon. She had been on vacation. She will contact HW Slater (PNL) when she wants to look at it.

Action Item:

GP Davis (Ecology) will contact HW Slater (PNL) to conduct a review of the SHLWS logbook.

There was agreement between RL, PNL and Ecology to start over on the TPA Notice of Deficiency process for the closure plan. This was agreed upon because almost all the individuals involved, including RL, PNL and Ecology staff, were new to the closure plan project and it had been 3 years since the plan was last revised.

MA Selby (Ecology) stated that even though GP Davis had been assigned to a different section of Ecology, she would follow through on the review and approval of the closure plan.

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Summary of Discussion and Commitments/Agreements
(continued)

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RN Krekel (RL) stated that a RL letter had been sent to the contractors, including PNL, instructing them to evaluate the need for separate EPA identification (ID) numbers for Department of Energy (DOE) property that is non-contiguous with the Hanford site and to initiate the process to obtain them if necessary. He informed Ecology that this would probably affect the SHLWS T/S unit because it was located on non-contiguous DOE property operated by Kaiser Engineers Hanford (KEH). RL and PNL will status Ecology of the separate EPA ID number issue at the next SHLWS unit manager meeting.

Due to the pending regulatory changes, which will require the use of Model Toxics Control Act (MTCA) cleanup standards, the standards will be utilized in the next revision of the closure plan.

In response to Ecology's comment that CLP protocol should be used for analysis of analytic data, RN Krekel stated that RL and its contractors are preparing to use the Data Quality Objectives (DQO) process to determine the appropriate level of Quality Assurance. He stated that the intent to use the DQO process had been communicated to other Ecology staff in other forums (other Unit Manager Meetings). He also informed Ecology that the process will first be utilized in an upcoming meeting tentatively scheduled on August 25 and 26 for the Ashpit Demolition Site and the Hexone Storage and Treatment Facility. RL will find out the exact location and time for the meeting and let GP Davis and MA Selby know so that they may attend.

Action Item:

RN Krekel (RL) will determine the location, date and time of the meeting which will utilize the DQO process and let Ecology (GP Davis, MA Selby) know.

Greta stated that state only wastes need to be referenced into the plan.

RN Krekel (RL) wants documented in the Unit Manager Meeting Minutes that GP Davis received a copy of the R.O. Lokken Document referenced in the last version of the closure plan. GP Davis received a copy of the RO Lokken Document titled, "Treatment of Excess Process Chemicals (Simulated High-Level Waste Slurry)" in a June 29, 1993 status meeting for the SHLWS unit.

August 10, 1993
8:00 a.m. to 10:00 a.m.

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Attachment 4

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Action Items

<u>Action Item</u>	<u>Description</u>
8-10-93:1	Ecology will conduct a review of the SHLWS logbook. ACTION: GP Davis (Ecology) OPEN
8-10-93:2	Check out the status of the Hanford background study and see if could be used in establishing background levels for the SHLWS T/S closure plan. ACTION: RN Krekel (RL) OPEN
8-10-93:3	Determine the location, date and time of the unit manager's meeting which will address the DQO process and let Ecology (GP Davis, MA Selby) know. ACTION: RN Krekel (RL) OPEN

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Attachment 5

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Discussion of 6/29/93 Ecology Informal Comments on Closure Plan

List of concerns and suggestions for the 1234 Yard Closure Plan.

1. Sampling procedure for: sodium hydroxide and heavy metals.

The sampling protocol is discussed in appendix A. We will look for elevated pH levels and Na against background measurements.

2. Would like to look at log book for the grouting activities.

These records are maintained by Wayne Slater (376-0575) and are available for review at 324/108/300.

3. What are the estimated quantities of leaks or spills from the storing or treating of materials at this yard?

4. Log book - mobility: nitrates (considerable amounts and have high mobility).

These records are maintained by Wayne Slater (376-0575) and are available for review at 324/108/300.

5. Previous activities: - Bis "2 - ethyl hexyl" phthalate.

These records are maintained by Wayne Slater (376-0575) and are available for review at 324/108/300.

6. Sodium nitrate crystals reported to have been seen on some drums. What was done about this if anything?

These records are maintained by Wayne Slater (376-0575) and are available for review at 324/108/300.

7. High levels of lead throughout the 1100 area. Pay close attention to lead levels.

Lead analyses are supported for both background levels and site closure activities.

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8. Add a testing method column to Table 8?

Table A-8 has been amended to reference Table A-6 which includes all required testing methods.

9. Provide a sampling schedule and identify the method. Differentiate what metals will be sampled for.

The sampling schedule which may be affected by revisions in the Dangerous Waste regulations will be provided with method identifications during the final review process.

10. Due to regulation changes, MTCA standards will be in place by December, please take this into account.

We are awaiting transmittal of the revised MTCA standards in order to incorporate them into affected sections of the closure plan.

11. Table 8 notes, section, page A-41, this section should contain: "Data created should be counter checked by CLP protocol and should be checked down to 15 c."

CLP protocol issues are currently under a DQO planning review process conducted by the DOE and site contractors. Following approval by Ecology, the SHWLS closure plan will be amended to reflect any required changes.

12. Document should be resubmitted to Ecology (Kennewick Office) for review: Lokken, R.O. 1989. Treatment of Excess Process Chemicals (Simulated High Level Waste Slurry). PNL-6915, Pacific Northwest Laboratory, Richland, Washington. (For the Kennewick Office).

This document will be provided by Wayne Slater.

13. Section 2.0 Data Requirements. This section will be significantly affected by changes in the Dangerous Waste Regulations.

We are awaiting the revised Dangerous Waste Regulations and will incorporate any necessary changes to the affected section of the closure plan.

14. Last paragraph on page A-9 needs to say that WAC 173-303-610 will be abided by.

Clarification is necessary to determine if the text which references WAC 173-303-610 must be completely revised.

15. Revise text on page A-12 to include limits set by WAC 173-303 (TCLP).

These limits are referenced on page A-11.

16. First paragraph on page A-22 should include: "Data created should be counter checked by CLP protocol and should be checked down to 15 c."

CLP protocol issues are currently under a DQO planning review process conducted by the DOE and site contractors. Following approval by Ecology, the SHWLS closure plan will be amended to reflect any required changes.

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Distribution:

C.M. Andersen PNL (P7-40)
E.M. Bowers RL (K8-50)
R.C. Bowman WHC (H6-24)
D.S. Broussard PNL (K1-67)
R.M. Carosino RL (A4-52)
G.P. Davis Ecology
B.J. Day PNL (P7-68)
D.L. Duncan EPA (HW-106)
D.K. Jones RL (A5-90)
R.N. Krekel RL (A5-15)
F.A. Ruck WHC (H6-23)
M.A. Selby Ecology
H.W. Slater PNL (P7-68)
H.T. Tilden PNL (P7-68)
J.L. Waite WHC (B2-35)

GSSC RCRA UMM File, Care of S. Lijek, B1-42

ADMINISTRATIVE RECORD (Simulated High Level Waste Slurry Treatment/Storage,
TS-3-4) [Care of EPIC, WHC (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste Library,
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